

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, *et al.*,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment for the Humanities, *et al.*,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF CARLA ZECHER

I, Carla Zecher declare as follows:

1. I, Carla Zecher, am Executive Director at The Renaissance Society of America, Inc. (RSA).
2. The Renaissance Society of America is a member of the American Council of Learned Societies.
3. I was in the process of applying for a grant from the National Endowment for the Humanities Division of Educational Programs to sponsor an Institute for K–12 Teachers.
4. I planned to partner with the City University of New York Graduate Center (CUNY GC), where the RSA office is located, on this grant application. As preparation to submit the application, I conferred with the President of the RSA Board of Directors, who is a CUNY GC faculty member. I also spoke with an anonymous individual donor who supports programs for high school teachers at the RSA, to obtain seed funding for expenses that would not be covered in the grant. I then met with NEH program officer Emily Brantley on December 5, 2024. Brantley indicated that because of my previous experience directing NEH summer seminars and

institutes and because the CUNY GC has also held these grants before, I would be considered a returning applicant, rather than a new one. Brantley explained that if I submitted a draft narrative by January 6, 2025, it would be reviewed at the NEH prior to submission of the final proposal on March 6, 2025. During the month of December 2024, I outlined a plan for the content and structure of the institute and the partnerships we would need. Having laid all the groundwork, I decided to delay the application for a year and submit in March 2026 instead, because even with all the groundwork in place, it takes a lot of time to obtain the formal commitments from all parties.

5. I recently learned that NEH has terminated the Institutes for K-12 Educators Program. As a result, I will not be able to submit an application to this program as planned.

6. Executed on June 5, 2025 in New York, NY

Carla Zecher

Carla Zecher